

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

VS.

LYNDELL LEROY PRICE

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CRIMINAL NO. 4:14-CR-00578

**UNOPPOSED MOTION FOR EARLY TERMINATION OF
SUPERVISED RELEASE**

COMES NOW, LYNDELL LEROY PRICE, who moves the Court to enter an order terminating his period of supervised release. In support of this motion, the Defendant would show as follows:

I.

The Defendant pled guilty to Count 10S of the Superseding Indictment in violation of Title 18, U.S.C. § 287 with aiding and abetting the filing of false claims. The Defendant was sentenced to thirty (30) months in the custody of the United States Bureau of Prisons; after which he was placed on Supervised Release for a term of three (3) years. Mr. PRICE was also ordered to make restitution to the Internal Revenue Service, in the amount of \$129,964.00

Defendant was released to supervision by the United States Probation Department in October of 2018.

II.

Since his release, Mr. PRICE has complied with all of the conditions of his supervision, adhered to all of the terms of his release, and completely satisfied the full and total amount of restitution. Additionally, Defendant has satisfied all requests made by his Probation Officer.

Mr. PRICE has been a full-time business owner since his release from custody in October of 2018.

III.

Prior to Mr. PRICE'S incarceration, he was the Proprietor of a viable business, named the Turkey Leg Hut. After his release, the Defendant immediately went back into running his business along with his wife. It is now one of the most successful restaurants in the city. At the Turkey Leg Hut, Mr. PRICE employs 183 people, with 35 of those individuals being part-time. He has consciously employed people who would not necessarily be able to find employment elsewhere.

Mr. PRICE has also been recognized by the Mayor of Houston, Sylvester Turner, for his outstanding service and contributions to the community. The Greater Houston Black Chamber of Commerce awarded the Defendant and his Wife, with the Pinnacle Award for excelling in African American Business achievements. And, he is actively involved with 100 Black Men, which is an organization dedicated to improving the quality of life in the community, and enhancing educational and economic opportunities for all African Americans.

The Defendant, since his release, has made great strides in his life, his family and his community.

IV.

The United States Probation Office does not ordinarily recommend early termination, however, USPO Sherry Hartwell has informed Defense Counsel that she is unopposed to this motion and Defendant's early termination.

AUSA E. Vincent Carroll has confirmed that Mr. PRICE has satisfied all restitution

and fees assigned to him in this case, and he is UNOPPOSED to this motion and Defendant's early termination.

Mr. PRICE now respectfully requests this Court to grant his release from supervision for satisfactory completion of all conditions and good behavior.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that this Honorable Court enter an order terminating his period of supervised release.

Respectfully Submitted,

/s/ Robert A. Jones

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CERTIFICATE OF SERVICE

It is hereby certify that a true and correct copy of the above and foregoing motion has been filed, which will send notifications of such filing to AUSA E. Vincent Carroll and USPO Sherry Hartwell.

DATE: March 26, 2020

/s/ Robert A. Jones
ROBERT A. JONES

CERTIFICATE OF CONFERENCE

Both AUSA E. Vincent Carroll and USPO Sherry Hartwell have been contacted via teleconference and they are both UNOPPOSED to this motion.

/s/ Robert A. Jones
ROBERT A. JONES

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ORDER TERMINATING PROBATION

ON THIS DAY came to be heard Unopposed Motion for Early Termination of Supervised Release, and having been considered, said Motion is hereby:

_____ GRANTED

_____ DENIED

SO ORDERED on this the _____ day of _____, 2020.

UNITED STATES DISTRICT JUDGE